

CORPORATE SOCIAL RESPONSIBILITY POLICY

of

**Carnation Developers
Private Limited**

Introduction

As an integral part of our commitment to Good Corporate Citizenship, we believe in actively assisting in improvement of the quality of life of people in communities, giving preference to local areas around our business operations. Company's CSR efforts shall focus on basic Infrastructure facilities like roads for nearby villagers and giving preference to needy and deserving communities.

Policy objectives

The main objective of Company's CSR policy are:

- To lay down guidelines to make CSR a key business process for sustainable development of the society.
- To directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around our sites and society at large.
- To generate goodwill and recognition among all stake holders of the company.

CSR Committee

CSR Committee shall be formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the board of directors.

Name of Members:

- (i) Mr. Ajay Kumar Agarwal, Director (Chairman of the Committee)
- (ii) Mr. Rajat Singhal, Director (Member of the Committee)
- (iii) Mr. Kailash Gupta, Director (Member of the Committee)

Role of the Committee include

- i) Drafting of the CSR policy and recommend the same to the Board for approval.

ii) Review and recommend any new CSR initiatives to be taken up by the company including the selection/appointment of implementation agencies.

iii) Review the progress of CSR projects already undertaken by the company and the utilization of budgets for each such projects.

iv) Review and recommend the CSR report to be included in the board's report.

v) Review and recommend any amendments to be made in the CSR policy of the Company.

vi) To carry such other functions as may be delegated to it by the board relating to CSR activities of the company.

CSR Activities

The scope of the CSR activities of the Company will cover the following areas but not limited to the same and may extend to other specific projects/ programs as permitted under the law from time to time.

- Eradicating extreme hunger and poverty;
- Promotion of education;
- Promoting gender equality and empowering women;
- Reducing child mortality and improving maternal health;
- Combating human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases;
- Ensuring environmental sustainability;
- Employment-enhancing vocational skills;
- Social business projects;
- Contribution to the Prime Minister's National Relief Fund or any other fund set up by the central government or the state governments for socio economic development and relief and funds for the welfare of the scheduled castes, scheduled tribes and other backward classes, minorities and women;
- Such other matters as may be prescribed.

CSR Spend/ Sources of Funding

The committee shall endeavor to spend atleast 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above.

Any surplus arising out of the contribution made for CSR Activities shall not form part of the business profit of the Company and redeployed for such activities.

Exclusion from CSR

The following activity shall not form part of the CSR activities of the Company:-

- The activities undertaken in pursuance of normal course of business of a company.
- CSR projects/programs or activities that benefit only the employees of the Company and their families.
- Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
- Any CSR projects/programs or activities undertaken outside India.

Applicability

The CSR policy of the company will be applicable from the date of approval of the policy in the Board meeting i.e. 04th April 2014.

Implementation

Manner in which the amount spent during the financial year 2014-15 is detailed below:

(1)	(2)	(3)	(4)	(5)	(6)	(7)
CSR project or activity identified	Sector in which the project is covered	Projects or programme (1) Local area or other (2) Specify the State and district where projects or programs was undertaken	Amount outlay (budget, project or programme wise)	Amount spent on the project or programme Sub Heads; Direct expenditure on projects or programmes Overheads	Cumulative expenditure up to the reporting period	Amount Spent direct or through implementing agency
Rural Development Project	Rural Development by making roads in the village	Village Bureda, Tehsil Tijara, Dist. Alwar, Rajasthan.	Rs.14 lacs approx	Direct: Nil	--	Direct: Nil

** As per the requirement committee can amend the expenses/activities at any time.*

Monitoring & Reporting

The CSR Committee will be responsible for the monitoring CSR activities and report to the Board from time to time.

The Committee Members will receive in a prescribed format, a quarterly report of CSR spend

An annual presentation will be made to the Committee which will also include the details of the projects / activities planned for the next year and its respective budgets.

The Board of Directors shall review the implementation of CSR every six months or as and when required.

Amendment of Policy

The CSR policy of the company may be amended at any time by the board of the company on the recommendation of the CSR committee.

Signed By Committee Members:

1. Ajay Kumar Agarwal- Sd/-

2. Rajat Singhal- Sd/-

Dated: 31.03.2015

Place: Gurgaon